

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MRS. UNITED STATES NATIONAL PAGEANT, INC.,

Plaintiff,  
vs.

**DECLARATION OF  
MOLLY LEWELLEN**

Case No. 6:18-cv-06587

STEPHANIE L. WILLIAMS, CROWN GARLAND LLC, and  
COSMOS INTERNATIONAL PAGEANTS, INC.

Defendants.

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STATE OF MISSISSIPPI     )  
COUNTY OF TIPPAAH     ) ss:

**MOLLY LEWELLEN** declares under penalty of perjury that:

1. I am an individual residing in Ripley, Mississippi. I make this Declaration at the request of Plaintiff Mrs. United States National Pageant, Inc. (“Mrs. United States”).

2. In 2016, I participated in a state-level Mrs. United States pageant in Mississippi. I was crowned Mrs. Mississippi United States and participated the National Miss United States Pageant (the “National Pageant”). Every year, the winners of the state-level Mrs. United States pageants compete in the National Pageant. Throughout this process, I became familiar with the Mrs. United States brand.

3. In 2017, I contracted with Mrs. United States to serve as the State Director for Mrs. United States pageants held in Mississippi.

4. As State Director, I am the administrator of several Facebook pages that were developed to promote Mississippi pageants and to recruit new contestants, including the “Miss Mississippi United States Organization” page ([www.facebook.com/mississippiunitedstatesorg/](http://www.facebook.com/mississippiunitedstatesorg/)). I am licensed to use the Mrs. United States Trademark on these pages.

5. Two or three months before the 2018 National Pageant, Stephi Williams, the Mrs. United States National Director, requested that I make her an administrator of the Mississippi Mrs. United States’ Facebook pages. I granted her privileges but remained an Administrator.

6. Before the 2018 National Pageant, I learned that Stephi similarly made this request to other State Directors and after she gained access ultimately removed their access from these pages. I was able to maintain control over the Mississippi Facebook Pages.

#### **Mrs. United States Tennessee Facebook Pages**

7. Before the National Pageant held in July 2018, Summer Blalock was the Mrs. United States State Director for Tennessee. Ms. Blalock, along with Stephi Williams, now work for a competing pageant company, Cosmos International Pageants.

8. After the 2018 National Pageant, I took over as the Mrs. United States State Director for Tennessee and Alabama. I maintained this same role in Mississippi.

9. Since becoming the Mrs. United States State Director for Tennessee, I have not been able to access the Facebook pages originally developed and used for the Mrs. United States pageants held in Tennessee. It appears that Summer Blalock has converted these Facebook pages to Cosmos International Pageant pages and that the Mrs. United States’ content previously posted on these pages has been deleted.

10. By contrast, the previous Alabama State Director for Mrs. United States, Molly Franks King, granted me administrative privileges for the Alabama Mrs. United States Facebook pages when I took over that role following the 2018 National Pageant.

11. The converted Mrs. Unites States Tennessee Facebook pages include:

- Tennessee United States Pageants (now called “Tennessee Cosmos Pageants” and found at: [www.facebook.com/TennesseeCosmosPageants/](http://www.facebook.com/TennesseeCosmosPageants/)).
- Miss Northeast Tennessee United States Pageant (now called “Miss Northeast Tennessee Cosmos Pageants” and found at: [www.facebook.com/Miss-Northeast-Tennessee-Cosmos-Pageants-141813689559871/](http://www.facebook.com/Miss-Northeast-Tennessee-Cosmos-Pageants-141813689559871/))
- Miss Winterfest United States Pageant (now called “Miss Winterfest Cosmos Pageants” and found at [www.facebook.com/misswinterfestPF/](http://www.facebook.com/misswinterfestPF/)).
- Maryville United States Pageants (now called “East Tennessee Cosmos Pageants” and found at: [www.facebook.com/East-Tennessee-Cosmos-Pageants-193652014542069/](http://www.facebook.com/East-Tennessee-Cosmos-Pageants-193652014542069/)).
- Fall Fest United States Pageants (now called “Fall Fest Cosmos Pageants” and found at: [www.facebook.com/FallFestCosmos/](http://www.facebook.com/FallFestCosmos/)).
- Little Miss & Pre-Teen Tennessee United States (now called “Mini Miss Tennessee Cosmos Pageants” and found at: [www.facebook.com/MiniMissTNCosmosUnitedStates](http://www.facebook.com/MiniMissTNCosmosUnitedStates)).
- Miss Teen Tennessee United States (now called “Miss Teen Tennessee Cosmos” and found at: [www.facebook.com/missteentennesseecosmos/](http://www.facebook.com/missteentennesseecosmos/)).

12. By the end of July 2018, the above listed pages had approximately 8,000 “Likes”. These pages gained a following by using and promoting the Mrs. United States brand. Screenshots showing that the names of these pages changed from the Mrs. United States brand to Cosmos, and the amount of “Likes” associated with these pages are attached as **Exhibit Z**.

13. Additionally, a Mrs. Tennessee United States page was converted to a “Mrs. Tennessee Cosmos” page. It appears that this page has been taken down. A screenshot, showing that the page had 1,665 “Likes” is also included as part of Exhibit Z, following the above-referenced pages.

14. Moreover, it appears that the Miss Tennessee United States Facebook page that was previously administered by Summer Blalock in her role with Mrs. United States has also been removed from Facebook. A screenshot showing that the page had over 2,300 “Likes” is also included as part of Exhibit Z, following the above-referenced pages.

15. I did not personally capture these screen shots, but I personally visited the Facebook pages before and after Summer Blalock began working for Cosmos. I understand these screen shots to be fair and accurate representations of what I viewed on Facebook with some redactions.

16. These Facebook pages are used to recruit pageant contestants. Because they were developed using the Mrs. United States brand, I believe they should be turned over to me to use as the Tennessee State Director for Mrs. United States.

17. I reviewed a video posted on the former Tennessee United States Pageants Facebook page (now called “Tennessee Cosmos Pageants”) on or about July 28, 2018. An excerpt of this video is included on a disc attached as **Exhibit AA**.

18. The video features Summer Blalock, sitting with the 2018 Miss Teen Tennessee United States winner. Ms. Blalock refers to her as the “Miss Teen Tennessee Cosmos.” Ms. Blalock recommends following Stephi Williams to Cosmos from the Mrs. United States system. Ms. Blalock mentions numerous similarities between the Mrs. United States brand

and Cosmos. It appears that this video was posted to recruit followers of the Mrs. United States brand to compete in Cosmos pageants.

### **The 2018 National Pageant**

19. Stephi Williams oversaw the July 2018 National Pageant before she began working with Cosmos. She charged customers to view a live feed of the National Pageant online. The live feed of the National Pageant was cut off before the winner was announced. After the live feed was cut off, I began to record the National Pageant using my phone and streamed it using Facebook Live. I did this so that the families and friends of my Mississippi contestants could continue to watch the pageant they paid to see.

20. As I was recording, an individual named Chris Kerchein struck my back with his hand and demanded that I stop recording. Mr. Kerchein then put his arm over my shoulder and demanded that I delete the video. I believe Mr. Kerchein's aggressive behavior would have escalated if I had not stopped recording and deleted the video as he demanded. Mr. Kerchein works with Stephi Williams. I have seen him at other pageants and he is involved in technology and video recording for Stephi Williams.

21. Stephi Williams informed me and other Mrs. United States Directors that we cannot compete with her or Cosmos International Pageants. She also told me that I was prohibited from using Mrs. United States brand logos.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 27, 2018.

s/ Molly Lewellen  
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MOLLY LEWELLEN